

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MASSACHUSETTS

Civil Action No.: 04-30054-MAP

DEBORAH ST. PETER and)
MATTHEW BOGACZ,)
Plaintiffs)
)
v.)
)
TOWN OF AGAWAM, TOWN OF)
AGAWAM POLICE DEPT.,)
AGAWAM POLICE CHIEF)
ROBERT CAMPBELL)
ANTHONY GRASSO, JAMES)
WHEELER, RICHARD NILES,)
KEITH BOPKO, JOHN MOCCIO,)
OFFICER MCGOVERN)
Defendants)

JOINT MOTION TO CONTINUE
CURRENT DEADLINES

Now come the Parties in the above-entitled action and hereby respectfully request that this Honorable Court grant their Joint Motion to Continue Current Deadlines.

As reason therefor, on or about September 2, 2005, the parties agreed upon entering into a mediation with Burbank Mediation Services. Said mediation is scheduled for Monday, November 21, 2005, at 10:00 a.m., at the office of Robinson, Donovan, 1500 Main Street, Springfield, MA., with the hope of settlement.

The Court's current deadlines are as follows:

9/2/05	Plaintiff's to disclose trial expert information
9/30/05	Defendants to disclose trial expert information
10/28/05	All expert depositions to be completed
11/16/05	Pretrial Conference

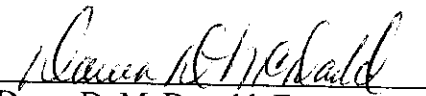
The Parties jointly request that these deadlines be stayed until the case is mediated on November 21, 2005. The Parties will then report the status of the matter to the Court and, if necessary, will request the deadlines be re-set.

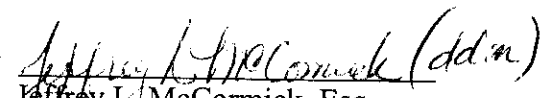
WHEREFORE, the Parties request that this Honorable Court grant their Motion to Continue Current Deadlines until the outcome of the mediation scheduled for November 21, 2005.

RESPECTFULLY SUBMITTED BY:

The Plaintiffs,
Deborah St. Peter & Matthew Bogacz

The Defendants
Town of Agawam, et al

By: 
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CERTIFICATE OF SERVICE

I, Dawn D. McDonald, do hereby certify that I made service of the foregoing document on this 13th day of October, 2005, by first class mail, postage prepaid, to:

Jeffrey L. McCormick, Esq.
Robinson, Donovan P.C.
500 Main Street
P. O. Box 15609
Springfield, MA 01115


Dawn D. McDonald, Esq.